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CLERK U.S. DISTRICT COURT  
CENTRAL DIST. OF CALIF.  
LOS ANGELES

UNITED STATES DISTRICT COURT

FOR THE CENTRAL DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

v.

INWOOK YOO,  
aka "Andy Yoo,"

Defendant.

CR No. 18-

I N F O R M A T I O N

[18 U.S.C. § 1349: Conspiracy  
to Commit Bank Fraud; 18 U.S.C.  
§ 1028A: Aggravated Identity  
Theft; 18 U.S.C.  
§§ 981(a)(1)(C), 982(a)(2), and  
28 U.S.C. § 2461(c): Criminal  
Forfeiture]

18CR00378-jpw

The United States Attorney charges:

COUNT ONE

[18 U.S.C. § 1349]

Beginning in or before December 2014, and continuing  
through at least July 2017, in Los Angeles County, within the  
Central District of California, and elsewhere, defendant INWOOK  
YOO, also known as "Andy Yoo" ("Defendant"), together with  
others known and unknown to the United States Attorney,  
conspired to commit bank fraud, in violation of Title 18, United  
States Code, Section 1344. The object of the conspiracy was  
carried out, and to be carried out, in substance, as follows:  
Defendant would obtain social security numbers, manipulate the

1 credit scores associated with those numbers by assigning random  
2 names to the numbers and then having the names and numbers added  
3 as authorized users onto credit card accounts with excellent  
4 payment histories, and then apply for new credit cards using  
5 those names and social security numbers. Defendant used the  
6 bank-issued credit cards he thereby obtained at collusive  
7 merchants, where his co-conspirators charged them for fictitious  
8 purchases and then divided the resulting payments with  
9 defendant. As a result of this conspiracy, victims including  
10 American Express, Capital One, Chase Bank, Discover Financial  
11 Services, Citibank, and Synchrony Bank, all of which were then  
12 federally insured financial institutions, suffered actual losses  
13 of at least \$5,071,259.

COUNT TWO

[18 U.S.C. § 1028A]

Beginning in or before December 2014, and continuing through at least July 2017, in Los Angeles County, within the Central District of California, and elsewhere, defendant INWOOK YOO, also known as "Andy Yoo," knowingly transferred, possessed, and used, without lawful authority, a means of identification of another person during and in relation to a felony violation of Title 18, United States Code, Section 1349, Conspiracy to Commit Bank Fraud, as charged in Count One.

FORFEITURE ALLEGATION

[18 U.S.C. § 981(a)(1)(C), 28 U.S.C. § 2461(c)

and 18 U.S.C. § 982(a)(2)]

1. Pursuant to Rule 32.2 of the Federal Rules of Criminal Procedure, notice is hereby given to defendant INWOOK YOO, also known as "Andy Yoo" ("Defendant"), that the United States will seek forfeiture as part of any sentence in accordance with Title 18, United States Code, Section 981(a)(1)(C), Title 28, United States Code, Section 2461(c), and Title 18, United States Code, Section 982(a)(2), in the event of defendant's conviction under Count One or Two of this Information.

2. Defendant shall forfeit to the United States the following property:

a. All right, title and interest in any and all property, real or personal, constituting, or derived from, any proceeds obtained, directly or indirectly, as a result of any offense set forth in Count One or Two of this Information including, without limitation:

i. approximately \$927,760.00 in U.S. Currency seized on or about July 20, 2017 during the execution of a search warrant at a Los Angeles, California residence;

ii. approximately \$300,000.00 in U.S. Currency seized on or about July 24, 2017 during the execution of a search warrant at Bank of America, 3442 Wilshire Boulevard, Los Angeles, California 90010 from Bank of America Safety Deposit Box Number 0347-00V97425 in defendant's name;

1           iii. approximately \$300,000.00 in U.S. Currency  
2 seized on or about July 24, 2017 during the execution of a  
3 search warrant at Chase Bank, 2970 West Olympic Boulevard, Los  
4 Angeles, California 90006 from Chase Safety Deposit Box Number  
5 1249 in defendant's name;

6           iv. approximately \$80,000.00 in U.S. Currency  
7 seized from defendant on or about July 20, 2017 at CA Metro  
8 Auto, 1501 West Washington Boulevard, Los Angeles, California;

9           v. approximately \$691,558.82 seized on or about  
10 July 21, 2017 from a bank account at Chase Bank in defendant's  
11 name and with the last four digits ending in 6688;

12           vi. approximately \$351,201.56 seized on or about  
13 July 21, 2017 from a bank account at Chase Bank in defendant's  
14 name and with the last four digits ending in 6250;

15           vii. approximately \$212,107.46 seized on or about  
16 July 21, 2017 from a bank account at Chase Bank in I. Nuk,  
17 Inc.'s name and with the last four digits ending in 6525;

18           viii. approximately \$104,318.40 seized on or about  
19 July 21, 2017 from a securities account at Chase Bank in I. Nuk,  
20 Inc.'s name and with the last four digits ending in 0913;

21           ix. approximately \$259,723.76 seized on or about  
22 July 21, 2017 from a bank account at Bank of America in  
23 defendant's name and with the last four digits ending in 6343;

24           x. approximately \$242,877.66 seized on or about  
25 July 21, 2017 from a bank account at Bank of America in  
26 defendant's name and with the last four digits ending in 2910;  
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1           xi. approximately sixty-four gold bars and three  
2 silver bars and miscellaneous silver and gold coins seized on or  
3 about July 20, 2017 during the execution of a search warrant at  
4 a Los Angeles, California residence;

5           xii. approximately fifty gold bars seized on or  
6 about July 24, 2017 during the execution of a search warrant at  
7 Bank of America, 3442 Wilshire Boulevard, Los Angeles,  
8 California 90010 from Bank of America Safety Deposit Box Number  
9 0347-00V97425 in defendant's name;

10           xiii. approximately \$109,990.00 seized on or about  
11 July 27, 2017 from an account at Coinbase, Inc. in defendant's  
12 name and with the last four digits ending in 3122; and  
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14           xiv. the real property with Assessor's Parcel  
15 Number 5502-024-120, and with title held in defendant's name;  
16 and

17           b. A sum of money equal to the total value of the  
18 property described in subparagraph a above.

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1           3. Pursuant to Title 21, United States Code, Section  
2 853(p), as incorporated by Title 18, United States Code, Section  
3 982(b), and Title 28, United States Code, Section 2461(c),  
4 defendant shall forfeit substitute property, up to the value of  
5 the property described in the preceding paragraph if, as the  
6 result of any act or omission of defendant, the property  
7 described in the preceding paragraph or any portion thereof (a)  
8 cannot be located upon the exercise of due diligence; (b) has  
9 been transferred, sold to, or deposited with a third party; (c)  
10 has been placed beyond the jurisdiction of the court; (d) has  
11 been substantially diminished in value; or (e) has been  
12 commingled with other property that cannot be divided without  
13 difficulty.

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16           NICOLA T. HANNA  
            United States Attorney

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18           

19           LAWRENCE S. MIDDLETON  
20           Assistant United States Attorney  
            Chief, Criminal Division

21           RANEE A. KATZENSTEIN  
22           Assistant United States Attorney  
23           Chief, Major Frauds Section

24           ANDREW BROWN  
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